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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In Re: Application of MOON LIMITED for
An Order Seeking Discovery from
JPMORGAN CHASE BANK, N.A. and
CITIBANK, N.A.

Case No. _____

pursuant to 28 U.S.C. § 1782,
In Aid of a Foreign Proceeding

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**EX PARTE APPLICATION FOR AN ORDER PURSUANT TO 28 U.S.C. § 1782 TO
CONDUCT DISCOVERY FOR USE IN A FOREIGN PROCEEDING**

Based on the concurrently filed Declarations of V. David Rivkin and Leung Tze Him Gilbert and exhibits thereto and the accompanying Memorandum of Law, Petitioner Moon Limited hereby requests that this Court issue the Order annexed as Exhibit A hereto, granting Petitioner leave pursuant to 28 U.S.C. § 1782 to serve JPMorgan Chase Bank, N.A. (“JPMCB”) and Citibank, N.A. (“Citibank”) with the subpoenas annexed hereto as Exhibits B and C, in order to enable Petitioner to obtain discovery for use in a proceeding in Hong Kong. The factual background of this case is laid out in the Declarations of V. David Rivkin and Leung Tze Him Gilbert and the Memorandum of Law.

Dated: New York, New York
June 14, 2019

Respectfully submitted,

/s/ John A. Smitten

JOHN A. SMITTEN

V. DAVID RIVKIN

Attorneys for Petitioner